From:
 randall.c.harvey@gm.com

 To:
 Jason Gumbs/DC/USEPA/US@EPA

Cc: orehowsky.greg@epa.gov; Khesha Reed/DC/USEPA/US@EPA; Larry Oeler/DC/USEPA/US@EPA

Subject: Fw: Request to waive in-use PM testing on HD diesels

Date: 09/30/2009 09:31 AM

Attachments: HD EPA Preview 09JUN09 PM waiver section only.pdf

Waive PM in use testing on HDD engines 07 to 09.pdf

Jason,

Wanted to add this topic to our AECD meeting agenda in late October. GM is currently issuing bids to conduct NTE testing on 2007 MY HD diesel trucks - as Andy stated, the cost will be very expensive. FYI - to further support the attached proposal, we plan to generate "in-use" emission data in our Milford Proving Ground High Feature test facility on a "customer" road schedule using a representative vehicle. That facility can duplicate typical road/environmental conditions. We should be able to provide that data at our to be scheduled meeting. Please call if you have questions. Thanks.

Randy

248-431-9935

---- Forwarded by Randall C. Harvey/US/GM/GMC on 09/30/2009 09:03 AM ----

Andrew S. Barren/US/GM/GMC

To Randall C. Harvey/US/GM/GMC@GM

CC

09/30/2009 08:26 AM

Subject Fw: Request to waive in-use PM testing on HD diesels

---- Forwarded by Andrew S. Barren/US/GM/GMC on 09/30/2009 08:26 AM ----

Andrew S. Barren/US/GM/GMC

To Larry P. Oeler cc dbishnu@arb.ca.gov

09/10/2009 10:49 AM

Subject Request to waive in-use PM testing on HD diesels

Larry,

My apologies for taking so long with this request, but things have been busy. We discussed this subject some time ago and I'm now writing to give you a "heads-up" that we are submitting a formal request to waive PM in-use testing on our 2007-2009MY heavy-duty diesel applications.

A draft of the formal letter (to be mailed shortly) is attached, and I'm also attaching the presentation material we reviewed with you in person during our heavy duty certification preview in June, 2009.

I'm copying Dipak Bishnu of the ARB per a request of his leadership at a similar certification preview we had with ARB in June, 2009.

We are at a point of releasing purchase orders for equipment, so if you could consider this request quickly and provide (even if informal) opinion on the request would could potentially avoid very costly investment of equipment that isn't necessary.

Thank you for your time and consideration.

Andy Barren General Motors

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